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FILED
MAR 18 2024
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

6 UNITED STATES BANKRUPTCY COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 SAN FRANCISCO DIVISION

9 IN RE:

10 LEGAL RECOVERY, LLC

11 Debtor

Case No.: 24-30074 DM
Chapter 11

OPPOSITION TO JOANNE ENG'S MOTION
TO CONVERT DEBTOR'S CHAPTER 11
INTO CHAPTER 7

Date: March 29, 2024
Time: 10:00 a.m.
Via Tele/Video Conference
www.canb.uscourts.gov/calendar


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16
17 MOTION IS BASELESS

18 The instant motion by Joanne Eng (Ms. Eng) is devoid of facts to support a motion to convert.

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20 Ms. Eng's contention is that she is part owner of the property known as 949-953 Lombard Street,
21 San Francisco (the "Lombard Street Property"). Ms. Eng's claim is belied by the judgment
22 entered in San Francisco Superior Court Case No. CGC 15-548357 on October 7, 2021, in which
23 it declared that LEGAL RECOVERY LLC (LR) is the owner of 100% of the economic interest
24 in LOMBARD FLATS LLC (which was the title owner of the Lombard Street Property); a
25 money judgment of \$2,453,393.60 was entered in favor of LR, and that LR may seize, execute
26 on or foreclose on LOMBARD FLATS LLC's properties. Subsequently, LR obtained a Writ of
27 Execution and a Sheriff's Sale of the Lombard Street Property was conducted on January 30,
28 2024 at which LR was the purchaser. The Sheriff's Deed was recorded on Feb. 5, 2024,

transferring full ownership of the Lombard Street Property to LR. Therefore, Ms. Eng's claim is baseless, and the instant motion should be denied.

Dated: 3/8/2024

/s/Leeds Disston 

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9 IN RE:

10 LEGAL RECOVERY, LLC

11 Debtor

Case No.: 24-30074 DM
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DECLARATION OF LEEDS DISSTON IN
SUPPORT OF OPPOSITION TO JOANNE
ENG'S MOTION TO CONVERT DEBTOR'S
CHAPTER 11 INTO CHAPTER 7

13 Date: March 29, 2024
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16 I, Leeds Disston, declare:


- 17
- 18 1. I am the attorney for Legal Recovery LLC (LR).
 - 19 2. On 7/8/2015, LR obtained a judgment of \$1,507,302.92 against MARTIN ENG (ENG) in
20 San Francisco Superior Court Case No. CGC 14-542378, a charging order against ENG's
21 membership interest in LOMBARD FLATS LLC, which was the title owner the property
22 known as 949-953 Lombard Street, San Francisco, (the "Lombard Street Property"), and
23 foreclosed on the charging order lien and acquired all of ENG's interest in LOMBARD
24 FLATS LLC.
 - 25 3. In San Francisco Superior Court Case No. CGC 15-548357, LR sued ENG, LOMBARD
26 FLATS LLC, and other defendants for conspiracy on fraudulent conveyances. On
27 October 7, 2021, the trial court issued the Statement of Decision and Judgment (the
28 "Judgment"). The Judgment set aside various fraudulent conveyances, declared ENG the
sole member and that LR is the owner of 100% of the economic interest in LOMBARD

1 FLATS LLC; entered a money judgment of \$2,453,393.60 in favor of LR, and that LR
2 may seize, execute on or foreclose on LOMBARD FLATS LLC's properties.

3 Subsequently, LR obtained a Writ of Execution and a Sheriff's Sale of the Lombard
4 Street Property was conducted on January 30, 2024 at which LR was the purchaser. The
5 Sheriff's Deed was recorded on Feb. 5, 2024, transferring full ownership of the Lombard
6 Street Property to LR.

7 I declare under penalty of perjury under the law of California that the foregoing is true and
8 correct.

9 March 8, 2024

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11 /s/ Leeds Disston 
12 Attorney for Legal Recovery LLC
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